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Attorneys for Defendants and Third-Party Alliant
Insurance Services, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Arthur J. Gallagher & Co.,

Plaintiff,

v.

Don Tarantino, an individual; Bernadette
Heater, an individual; Michael Machette,
an individual; Spencer Brush, an
individual,

Defendants.

Case No. 3:20-cv-05505 EMC

**Declaration of Bernadette Heater
in Support of Defendants' and
Third-Party Alliant's Local Rule
79(f) Statement Re: Gallagher's
Administrative Motion to Consider
Whether Others' Material Should
Be Sealed**

Ctrm: 5 (Hon. Edward M. Chen)

Complaint Filed: August 7, 2020

Declaration of Bernadette Heater

I, Bernadette Heater, declare as follows:

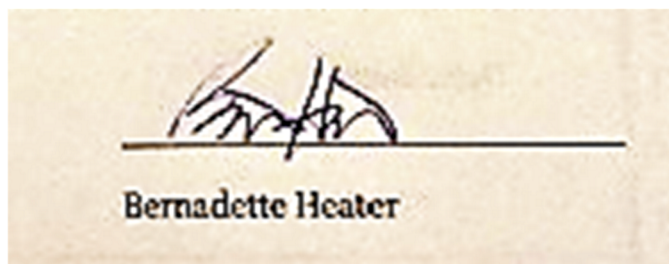
1. I am Vice President and Account Executive Lead at Alliant Insurance Services and a Defendant in this action. I know of the facts set forth in the declaration of my own personal knowledge and could and would testify to those facts if asked to do so.

2. I have reviewed or am otherwise informed of the contents of Exhibits 42, 47, and 48 to the Declaration of Meghan R. McMeel In Support of Plaintiff Arthur J. Gallagher & Co.'s Opposition to Defendants' Motion for Partial Summary Judgment. I understand that these documents were produced by Alliant in response to a subpoena served by Gallagher and were designated as either "Confidential" or "Highly Confidential—Attorneys Eyes' Only" under the Protective Order entered in the case.

3. My understanding is that Exhibits 42, 47 and 48 concern my compensation at Alliant. It is my understanding that Exhibit 42 is a document concerning my employment application to Alliant which shows compensation for my job position. Exhibits 47 and 48 are my 2020 and 2021 compensation statements at Alliant, which show my pay at Alliant, as well as information about my benefits, investments, and taxes. I view this information as highly private, personal information and I do not share it with the public. I would view it as an invasion of my privacy for this personal information to be made publicly available.

Executed on April 13, 2022 at Fairfield, California.

I swear under penalty of perjury that the foregoing is true and correct.



1 **Certificate of Service**

2 I hereby certify that, on April 14, 2022, the foregoing document entitled
3 **“Declaration of Bernadette Heater in Support of Defendants’ and Third-Party**
4 **Alliant’s Local Rule 79(f) Statement Re: Gallagher’s Administrative Motion to**
5 **Consider Whether Others’ Material Should Be Sealed”** was filed via the Case
6 Management/Electronic Case Filing (CM/ECF) system, with service to be made on all
7 parties deemed to have consented to electronic service via the automated generation and
8 e-mailing of a Notice of Electronic Filing (NEF) by the CM/ECF system.
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10 Dated: April 14, 2022

11 /s/ Seth M. Gerber
12 Seth M. Gerber
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